

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA	:	
	:	
- v. -	:	22 Cr. 215 (JSR)
	:	
SUNI MUNSHANI, and	:	
SURESH MUNSHANI,	:	
	:	
	:	
Defendants.	:	
-----X	:	

**THE GOVERNMENT’S BILL OF PARTICULARS**

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- *Of Counsel* -

The United States of America, by its attorneys, furnishes this Bill of Particulars in response to the Court's oral order during the hearing in this case on August 26, 2022, which required that the Government (1) "specify in a sentence or two precisely what the common conspiratorial agreement was that constituted what's referred to in [Count One of] the Indictment as a scheme"; and (2) identify the unnamed co-conspirators listed in Counts Two and Three of the Indictment.

**I. The Scheme Charged in Count One of the Indictment**

The Government alleges that, between in or about October 2011 and in or about October 2018, the defendants agreed to defraud the Victim Company of money and then funnel that money through bank accounts controlled by the defendants. To accomplish their scheme, the defendants caused the Victim Company to make payments to a purported third-party contractor that provided no services to the Victim Company and for a purported tax liability of the Victim Company, which payments were deposited into bank accounts controlled by the defendants.

**II. The Unnamed Co-Conspirators**

As alleged in the Indictment, the schemes charged in Counts Two and Three of the Indictment were carried out by defendant Suni Munshani and others, known and unknown. The Government does not allege that defendant Suresh Munshani participated in either of these schemes. The individual identified as Co-Conspirator-1 in Count Two of the Indictment is Jayant Ramchandani; the individual identified as Co-Conspirator-2 in Count Three of the Indictment is Sonjoy Jethmalani.

Dated: New York, New York  
September 2, 2022

Respectfully submitted,

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By: /s/  
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